

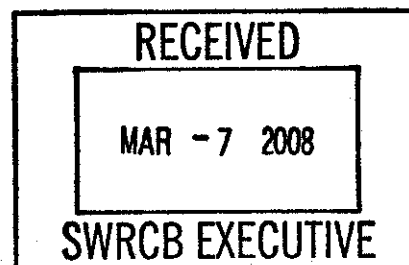


THE CITY OF SAN DIEGO

MAYOR JERRY SANDERS

3/18/08 Bd. Mtg. Item 13
Recycle Water Policy
Deadline: 3/10/08 by 12 p.m.

March 10, 2008



Tam Doduc,
Chair and Members of the
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100
Attn: Ms. Jeanine Townsend

Dear Chair Doduc and Members of the Board:

Subject: Comment Letter – Proposed Recycled Water Policy

Thank you for this opportunity to submit comments related to the State Water Resources Control Board's (SWRCB) proposed recycled water policy. We understand that our comments herein must be limited to new text, deletions or additions to text previously circulated in late September 2007.

As you may know, the City of San Diego (City) owns and operates two reclamation facilities with the capacity to produce 45 million gallons per day (mgd). The expansion of the City's production of recycled water is a core component of our water supply diversification strategy and is incorporated into the City's Urban Water Management Plan (UWMP) and also in the UWMPs of both the San Diego County Water Authority (SDCWA) and the Metropolitan Water District of Southern California (MWD).

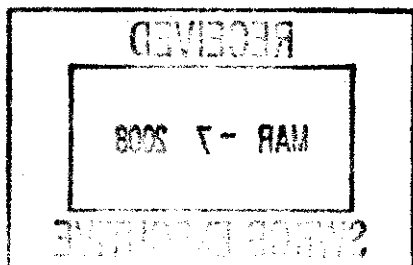
The City appreciates the efforts of the SWRCB to implement the recommendations of the Recycled Water Task Force and establish a uniform statewide interpretation of regulatory requirements for recycled water use. We agree with the intent of this goal and hope our comments, as follow, will help develop a recycled water policy that encourages the use of recycled water to meet future water demands.

It might interest the SWRCB to note that within the City of San Diego's service territory, approximately 90% of the recycled water put to beneficial use is for irrigation and the remaining 10% is used in cooling towers. A pilot indirect potable reuse project was recently authorized by San Diego's City Council and is currently underway.



Water Department

600 B Street, Suite 600, MS 906 • San Diego, CA 92101
Tel (619) 533-7595 Fax (619) 533-5325



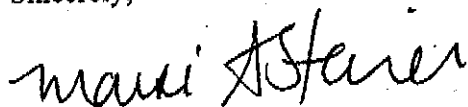
Page 2
Mr. Tam Doduc
March 10, 2008

The San Diego region has limited groundwater supplies and basins, relying instead on imported water supplies to provide approximately 85% to 90% of the region's water demands. The next largest source of water (besides conservation) is surface storage – collected rainwater. Source waters for imported water are a blend of Colorado River and State Water Project water.

Given the critical role that recycled water plays in our region, we respectfully request that the Board direct staff to fully consider the role that regulatory programs may play in affecting the desirability of this valuable resource. The Regional Board should ensure that there are no unnecessary regulatory barriers to increase the use of recycled water. To that end, we ask that the State Board postpone approval of the Policy as we believe the current draft needs significant improvement. We recommend that the State Board convene and facilitate regional stakeholder sessions which will provide an opportunity for participants to develop a clear Policy statement for recycled water use. This collaborative effort would be instrumental in crafting consistent statewide policies to maximize the use of recycled water.

The City appreciates the opportunity to provide these comments and looks forward to working with the SWRCB and its staff in adopting the final Recycled Water Policy. If you have any questions regarding our comments, please call me at (619) 533-4112.

Sincerely,



Marsi A. Steirer
Deputy Water Department Director

Page 3

Mr. Tam Doduc

March 10, 2008

bcc: Jennifer Casamassima, Water Reuse Program Manager, Water Resources and
Planning Division
Cathleen Pieroni, Senior Water Resources Specialist, Water Resources and
Planning Division
RMU 21.6